

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GEORGIA-PACIFIC CONSUMER
PRODUCTS LP, FORT JAMES
CORPORATION, and GEORGIA-PACIFIC
LLC,

Plaintiffs,

vs.

NCR CORPORATION, INTERNATIONAL
PAPER CO., and WEYERHAEUSER CO.,

Defendants.

Case No. 1:11-cv-00483

Hon. Robert J. Jonker

ORAL ARGUMENT REQUESTED

INTERNATIONAL PAPER COMPANY'S
SUPPLEMENT TO MEMORANDUM OF POINTS AND AUTHORITIES
IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT, OR ALTERNATIVELY,
FOR PARTIAL SUMMARY JUDGMENT

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A	1946 Annual Report for St. Regis Paper Company
B	Deed dated August 18, 1949 from Time, Incorporated to St. Regis Paper Company recorded on August 20, 1949 at Liber 589 page 360
C	Bill of Sale and Assignment dated August 18, 1949 between Time, Incorporated and St. Regis Paper Company
D	Exhibit from Affidavit of Thomas Host
E	Plot plans dated September 27, 1963 and March 1, 1965 of St. Regis Paper Company, Panelyte Division
F	Agreement dated June 22, 1956 between St. Regis Paper Company and Thor Corporation
G	Retirement Plan Termination Forms dated June 30, 1956
H	Letter, with attachments, dated February 21, 1957, from W. H. Gnad to Phil Kraushaar of Allied Paper Corporation
I	Defendant International Paper Company's Amended and Supplemental Responses to Plaintiffs' First Set of Requests for Admissions, served March 30, 2012
J	Lease dated June 29, 1956
K	Memorandum of Lease dated June 29, 1956
L	Assignment of Contracts, Etc. dated June 29, 1956 between St. Regis Paper Company and Thor Corporation
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Q	Railroad Spurs and Siding Agreement dated June 29, 1956 between St. Regis Paper Company and Thor Corporation
R	Trade Mark License dated July 1, 1956 between St. Regis Paper Company and Thor Corporation
S	Bill of Sale dated June 29, 1956 from St. Regis Paper Company to Thor Corporation
T	1955 Annual Report for Thor Corporation
U	Document titled "Allied Paper Corporation, Summary of Earnings 1956 Through May 1960 in M Dollars" prepared on July 26, 1960
V	Letter dated May 12, 1965 from Ward Harrison of Allied Paper Corporation to William R. Adams of St. Regis Paper Company
W	1960 Annual Report of Allied Paper Corporation
X	Securities and Exchange Commission Form S-1 Registration Statement dated November 12, 1959 for the St. Regis Paper Company
Y	St. Regis Paper Company Annual Reports from 1956 to 1966
Z	Letter dated May 24, 1965 from the President of St. Regis Paper Company to Ward Harrison of Allied Paper Corporation
AA	Letter dated May 25, 1965 from Herman C. Bernick of Allied Paper Corporation to Homer Crawford of St. Regis Paper Company
BB	Letter dated June 11, 1965 from the Secretary of St. Regis Paper Company to Herman C. Bernick of Allied Paper Corporation
CC	Agreement dated July 1, 1966 between St. Regis Paper Company and Allied Paper Corporation
DD	Indenture dated July 1, 1966 from St. Regis Paper Company to Allied Paper Corporation recorded on August 9, 1966 at Liber 818 page 555
EE	Publication entitled "Appleton Scene" dated January-February 1987
FF	Document entitled "Statement Concerning PCBs", dated February 1976 by the NCR Appleton Papers Division
GG	Memorandum entitled "NCR Business Analysis, NCR Paper In The 1970's" dated September 2, 1969 by Thomas W. Busch

HH	Mead Paper Memorandum from John Suci to R. L. Ordeman dated September 1, 1978
II	Excerpt of certain pages from the Expert Report of Robert J. Dolan, Ph.D.
JJ	Excerpt from the 1965 Fifteenth Annual World Review published by <i>Pulp & Paper</i>
KK	Excerpt from 1950 report prepared by George S. Armstrong for St. Regis Paper Company
LL	Excerpt from 1954 report prepared by George S. Armstrong for St. Regis Paper Company
MM	Georgia-Pacific's Responses to Defendant International Paper's First Set of Requests for Admission, served January 31, 2012
NN	Georgia-Pacific's Responses to Defendant International Paper's Second Set of Requests for Admission, served April 9, 2012
OO	Excerpts from deposition of James Youngs
PP	Excerpts from deposition of Elbert Herbert
QQ	Excerpts of deposition of Robert Meints
RR	Purchase Agreement dated February 26, 1965 between St. Regis Paper Company and Reliance Universal Inc.
SS	Indenture dated March 3, 1965 from St. Regis Paper Company to Reliance Universal, Inc. recorded on March 5, 1965 at Liber 808 page 270
TT	Excerpt from report dated December 31, 1955
UU	Job Order Purchase Authorization Budgeted Form dated November 2, 1955
VV	Magazine article entitled "PCBs, dyes top list of paper industry toxic chemical concerns for the '80s", by John L. Festa dated July 1981 from <i>Pulp & Paper</i>
WW	Newspaper article entitled "What made PCBs desirable also made them undesirable," by Mike Van Buren dated November 17, 1989 from the <i>Kalamazoo Gazette</i>
XX	Mead Corporation Debit Memos dated July 27, 1955 through October 25, 1955
YY	Excerpts from the Expert Report of Kenneth D. Jenkins, Ph.D.

ZZ	Excerpts from deposition of Kenneth Jenkins, Ph.D.
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Dated: July 31, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2012, I electronically filed the foregoing using the ECF system, which will send notification of such filing by operation of the Court's electronic systems. Parties may access this filing via the Court's electronic system.

/s/ Charles E. Shelton
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